

Access and Filing Instructions for Public Employees Required to File Financial Disclosures

Montgomery County employees in designated positions are required to file financial disclosure reports. When entering a position, the filer submits an Initial financial disclosure, which covers the prior calendar year as well as the portion of the current year prior to entering the filing position. Every year after filing the Initial financial disclosure, filers must submit Annual disclosures that cover the previous calendar year. And when leaving a filing position, filers submit a Final financial disclosure, which covers the time period from the end of the last filing period up to the date of separation from the filing position.

The financial disclosure filing system is electronic and can be accessed at www.montgomerycountymd.gov/financialdisclosure. Each filer accesses the system with a unique username and password. Filers with single sign-on credentials gain access to the Financial Disclosure System (FDS) using those credentials. Members of county boards, commissions and committees are issued usernames and temporary passwords, which can be retrieved by contacting Erin Chu at the Montgomery County Ethics Commission, either by telephone at (240) 777-6676, or by email at Erin.Chu@montgomerycountymd.gov. Temporary passwords for board/commission/committee members change on an annual basis, with the new temporary passwords contained (along with each member's individual username) in the upper right hand corner of the electronic notice letter each member receives at the start of each filing season.

NOTE: The FDS works best if you log in using either Google Chrome or Microsoft Internet Explorer 6.0 or newer as your web browser.

If you are using a temporary password to gain access to the FDS, after logging in the first time, you will be prompted to change your password. Be mindful of the password requirements when creating a new password (the password must be at least 8 characters long, and it must contain 3 out of the 4 following types of characters: UPPERCASE, lowercase, numbers, special characters). After changing your password, you must wait 30 minutes before logging back into www.montgomerycountymd.gov/financialdisclosure using your newly created password.

For all filers, once you have successfully logged in, you will be taken directly to the Main Menu page. Select the appropriate filing type (Initial, Annual or Final); for Annual filers, you will also be asked to select the Filing Year. **The FDS will not permit you to file an incorrect type of financial disclosure.** If you are required to file a Final disclosure, for instance, and you select Annual by mistake, you will receive an error message in red indicating that the FDS does not require that type of filing from you at that particular time.

It is possible to complete the form in separate sessions, logging out in between. The FDS has a timeout feature, where each session will expire after 30 minutes, regardless of

activity. All information saved within that session will still be in the system when the filer accesses the FDS again.

The form contains thirteen sections. In order to submit the form electronically, the filer must access each of the thirteen sections, regardless of whether there is information to report in each section. This is accomplished by clicking on the hyperlinked name of the section in the sections list, *reading the instructions*, and clicking on **Yes** if you have something to report or **No** if you do not have anything to report. If you click on **No**, you will be returned to the sections list, and a red X will appear in the row for the section you have just completed. If you click on **Yes**, you will see a blank form.

NOTE: Copy Data From Last Year: If you are a filer that filed in the prior year, on the blank data input form for each section, you will see a button at the top of the screen that says **Copy Data From Last Year**. If you reported information for the section you are currently working on, when you click that button, whatever you reported in your filing from the year immediately preceding the current filing will appear in line items at the top of the data input screen. In order to adjust or update any items from the previous filing, click **Select** on the appropriate line item. This will populate the data input fields below, and you can make adjustments as needed. When you are finished adjusting all questions related to each individual item, click **Update** at the bottom of the screen. This will send that data back to the top in the form of a line item, clearing the data input fields so that you may add a new item as needed. Alternately, if you have a line item from your previous filing that can be removed, click **Delete** on the appropriate line item.

If you have a new item to report in the section, fill out the data input fields, and then click **Save** at the bottom of the screen. The information you added will become a line item at the top of the page. This process can be repeated for as many line items as is needed to completely comply with reporting requirements.

After completing each section, click **Section Complete** at the top of the page. This will return you to the Menu page, so that you may move on to the next section of the report. You will see that the section in which you just added reportable information now shows a green check mark on the right hand side of the line for that section. This process should be completed for all thirteen sections.

Once all thirteen sections have been addressed, at the bottom of the sections list, click **Submit Finalized Form**. This button will not work unless each section has either a green check mark or red x on the right. After clicking **Submit Finalized Form**, a popup will appear reminding the filer that each section must be completed. After reading the popup, if you are sure you completed all thirteen sections, click OK to submit the financial disclosure to your designated reviewer. If you feel the need to review your work again before committing to the filing, click Cancel to remove the popup and go through each section before submitting the document to your reviewer.

When you submit your finalized form, it is sent to your departmental reviewer. After your reviewer approves it, the disclosure is sent on to the Ethics Commission for final

acceptance. Both the department reviewer and the Ethics Commission reviewer must accept the filing in order for it to be completed. If either the department reviewer or the Ethics Commission reviewer returns the filing to you, please read any notes and make adjustments as needed. This form must be resubmitted within a week of receiving the returned document.

NOTE: If your filing is returned to you, in order to access the editable version of your disclosure, click **View Status/History** on the Main Menu page after logging in. Then, on the Filing Status screen, click the “radio” button on the left of the appropriate line for the filing that was returned (any financial disclosure still in *Returned* or *Filing* status will have a “radio” button on this screen – it is best to work chronologically, older to newer, so that you can utilize the **Copy Data From Last Year** feature; if you have any older filings still in *Required* status, that indicates that you never accessed that filing, so in order to file for that report, you must go to the Main Menu and select the appropriate type of filing – Initial, Annual or Final). The “radio” button is a circle that you click with your cursor. After clicking the “radio” button, scroll down and click **Continue Filing** at the bottom of the screen. This will take you to the sections list for the filing you selected on the Filing Status screen. Then, continue filing as outlined above.

Important Information

- Initial financial disclosures must be submitted by filers within the first fifteen (15) days in a filing position.
- Remember that Initial financial disclosure statements cover information from the year **preceding** the present one, plus the portion of the current year prior to the filer entering a filing position. (*Example: if you entered a filing position on May 2, 2013, your Initial reporting period would be January 1, 2012, through May 1, 2013.*)
- Remember that Annual financial disclosure statements cover information from the year **preceding** the present one.
- Remember that Final financial disclosure statements cover information from the period between the last date of your previous Annual filing period and the date of your final filing or last day of service in the filing position.
- If you are leaving your filing position by virtue of leaving your county employment, failure to file your Final disclosure will result in a hold being placed on your final paycheck until the disclosure is completed.
- **READ THE INSTRUCTIONS FOR EACH SEPARATE SECTION!!!**

Filing Tips

1. You are not just reporting information about yourself – you are also reporting information regarding your immediate family member(s), such as your spouse, domestic partner, and/or dependent children.
2. If you own **or rent** a house in Montgomery, Prince George’s, Howard or Frederick County, Maryland; Washington, DC; or Fairfax or Loudoun

County, Virginia, you must report this in Section 1 of your financial disclosure filing. If you own or rent property outside these jurisdictions, do not report them.

3. If your Real Property holdings are encumbered by a mortgage or a home equity line of credit, these encumbrances should be listed in Section 1 AND fully disclosed in Section 7.
4. If you own individual stocks and/or bonds, you must report these holdings in Section 3 of your financial disclosure.
5. **DO NOT REPORT MUTUAL FUNDS IN YOUR FINANCIAL DISCLOSURE (Section 3)!**
6. ALL of your sources of income must be reported in Section 4, including your county employment (if applicable), rental income, outside employment income, dividends, insurance benefits, etc.
7. You do not have to disclose gifts you receive from relatives, unless the gift giving relative is or should be registered as a lobbyist in Montgomery County, Maryland, and does business with or lobbies the County agency with which you are affiliated, or owns a business that is regulated with the County agency with which you are affiliated (Section 5).
8. Credit card debt only has to be reported if you carried a balance of \$5,000 or more for 90 days or more during the reporting period on any individual credit card (Section 7).
9. Do not report debts owed to or by relatives in Sections 7 and 8.
10. Unless you are the County Executive, a member of the County Council, or a candidate for any of these offices, do not report your Government Bond holdings in Section 11.
11. Unless you are an elected official, do not report solicitation of gifts to charitable organizations in Section 12.
12. If you feel clarification is needed to explain anything in your disclosure, please include a note in Section 13.
13. If your disclosure is returned to you for adjustment, click View Status/History, select the filing you need to correct by clicking on the circle to the left of the applicable disclosure, and then click Continue Filing at the bottom of the screen. This will lead you to the editable version of your disclosure.